

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

H. CRISTINA CHEN-OSTER; LISA PARISI; and
SHANNA ORLICH, on behalf of themselves and all
others similarly situated,

Plaintiffs,

-against-

GOLDMAN, SACHS & CO. and THE GOLDMAN
SACHS GROUP, INC.,

Defendants.

No. 10 Civ. 6950 (LBS) (JCF)

**DECLARATION OF ADAM T. KLEIN IN SUPPORT OF
PLAINTIFFS' MOTION TO COMPEL DISCOVERY**

I, ADAM T. KLEIN, pursuant to 29 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am a partner at Outten & Golden LLP, attorneys for Plaintiffs and the putative class in the above-referenced action, and an attorney in good standing admitted to practice in the State of New York and before this Court.

2. I make this declaration on personal knowledge in support of Plaintiffs' Motion to Compel Discovery.

3. Attached are true and correct copies of the following documents:

a. Attached as Exhibit A is a copy of the November 2003 Employment Agreement signed by Plaintiff Lisa Parisi.

b. Attached as Exhibit B is a copy of *Benson v. CSA-Credit Solutions of Am., Inc.*, Case No. 11-160-M-02281-08 (July 6, 2010).

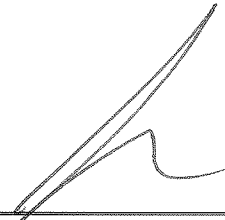
c. Attached as Exhibit C is a copy of *Passow v. Smith & Wollensky Rest. Group, Inc.*, AAA No. 11 160 00357 08 (July 28, 2010).

d. Attached as Exhibit D is a copy of *Smith & Wollensky Rest. Group v. Passow*, Civ. No. 10-cv-11498 (D. Mass. Jan. 18, 2011).

e. Attached as Exhibit E is a copy of *Galakhova v. Hooters of Am. Inc.*, Case No. 34-2010-00073111 (Cal. Super. Ct. July 27, 2010).

4. I declare under penalty of perjury under the laws of New York and the United States that the foregoing is true and correct.

Dated: New York, New York
January 21, 2011



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